

John E. Bragonje
Nevada Bar No. 9519
Jonathan W. Fountain
Nevada Bar No. 10351
LEWIS ROCA ROTHGERBER CHRISTIE LLP
3993 Howard Hughes Pkwy., Suite 600
Las Vegas, NV 89169
Telephone: 702.949.8200
jbragonje@lrrc.com
jfountain@lrrc.com

*Attorneys for Plaintiff and Counterdefendant
Harlan Stratton and Plaintiff O.E.M. Trailers, LLC*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

HARLAN STRATTON, an individual;
O.E.M. Trailers, LLC. an Arizona limited
liability company, inclusive,

Plaintiffs,

vs.

VINCE WEBB, an individual; TRAILERS
INTL, LLC, a Nevada limited liability company;
RNO EXHIBITIONS, LLC, a Nevada limited
liability company, inclusive,

Defendants.

TRAILERS INTL LLC, a Nevada limited
liability company,

Counterclaimant,

vs.

HARLAN STRATTON, an individual,

Counterdefendant.

Case No. 2:16-cv-01565-JAD-GWF

**STIPULATION AND ORDER TO
EXTEND THE TIME FOR PLAINTIFF
HARLAN STRATTON TO ANSWER
OR OTHERWISE RESPOND TO
DEFENDANT TRAILERS INTL
LLC'S COUNTERCLAIM AND TO
EXTEND THE TIME FOR SUBMISSION
OF THE PARTIES' PROPOSED
DISCOVERY PLAN AND SCHEDULING
ORDER**

(First Request)

Plaintiff Harlan Stratton and Plaintiff O.E.M. Trailers, LLC (together "Plaintiffs") on the one hand, and Defendants Vince Webb, Trailer Intl LLC, and RNO Exhibitions, LLC (together, "Defendants"), on the other hand, state the following:

1. The Complaint in this action was filed on July 1, 2016. (*See* ECF No. 1.)
2. After obtaining an extension of time from Mr. Stratton, Defendant Trailers Intl LLC

served its Answer and Counterclaim on August 16, 2016. (*See* ECF Nos. 8, 9, 12.)

3. Mr. Stratton's answer or other response to the Counterclaim is presently due on September 9, 2016.

4. The parties' principals are presently engaged in settlement discussions.

5. To facilitate settlement discussions, and not for the purpose of creating any unnecessary delay in these proceedings, the parties agree to extend the deadline for Mr. Stratton to serve his Answer to the Counterclaim by thirty (30) days, from September 9, 2016 to October 9, 2016.

6. In addition, pursuant to LR 26-1, the parties have thirty (30) days "after the first defendant answers or otherwise appears" to conduct a Fed. R. Civ. P. 26(f) discovery planning conference, and fourteen days thereafter to submit a proposed discovery plan and scheduling order. *Id.*; Fed. R. Civ. P. 26(f)(2). The Defendants appeared on August 16, 2016 when they filed their answers. (*See* ECF Nos. 10-12.) Under the federal and local rules, the parties have until September 15, 2016 to conduct a Rule 26(f) discovery planning conference and until September 29, 2016 to file a proposed discovery plan and scheduling order.

7. To further facilitate settlement discussions, and not for the purpose of creating any unnecessary delay in these proceedings, the parties agree to extend the present deadline for conducting a Rule 26(f) discovery planning conference by thirty (30) days, from September 15, 2016 to October 15, 2016, and extend the deadline for submission of a Rule 26(f) report and proposed discovery plan and scheduling order by thirty (30) days, from September 29, 2016 to October 31, 2016.

IT IS SO AGREED AND STIPULATED:

LEWIS ROCA ROTHGERBER
CHRISTIE LLP

FENNEMORE CRAIG, P.C.

By: /s/ Jonathan W. Fountain
John E. Bragonje
Nevada Bar No. 9519
Jonathan W. Fountain
Nevada Bar No. 10351
3993 Howard Hughes Pkwy., Suite 600
Las Vegas, NV 89169
Telephone: 702.949.8200

By: /s/ Leslie Bryan Hart
Leslie Bryan Hart
Nevada Bar No. 4932
A. J. Hames
Nevada Bar No. 13498
300 E. Second St., Suite 1510
Reno, Nevada 89501

jbragonje@lrrc.com
jfountain@lrrc.com

*Attorneys for Plaintiff and Counterdefendant
Harlan Stratton and Plaintiff O.E.M. Trailers,
LLC*

Telephone: 775.788.2228
lhart@fclaw.com
ahames@fclaw.com

JONCUS LAW LLC
Steve Joncus, Esq.
(*Pro Hac Vice* Application to be Submitted)
P.O. Box 838
Clackamas, OR 97015
Telephone: 971.236.1200
steve@joncus.net

*Attorneys for Defendants Vince Webb and RNO
Exhibitions, LLC and Defendant and
Counterclaimant Trailers Intl LLC*

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: September 12, 2016

CERTIFICATE OF SERVICE

I hereby certify that on September 8, 2016, I caused a true and accurate copy of the foregoing document entitled, STIPULATION AND ORDER TO EXTEND THE TIME FOR PLAINTIFF HARLAN STRATTON TO ANSWER OR OTHERWISE RESPOND TO DEFENDANT TRAILERS INTL LLC'S COUNTERCLAIM AND TO EXTEND THE TIME FOR SUBMISSION OF THE PARTIES' PROPOSED DISCOVERY PLAN AND SCHEDULING ORDER (First Request), to be filed with the Clerk of the Court via the Court's CM/ECF system, which will send/sent an electronic copy of the same to the following counsel of record:

Leslie Bryan Hart
A. J. Hames
FENNEMORE CRAIG, P.C.
300 E. Second St., Suite 1510
Reno, Nevada 89501
lhart@fclaw.com
ahames@fclaw.com

JONCUS LAW LLC
Steve Joncus
P.O. Box 838
Clackamas, OR 97015
steve@joncus.net

*Attorneys for Defendants Vince Webb and RNO
Exhibitions, LLC and Defendant and
Counterclaimant Trailers Intl LLC*

Dated: this 8th day of September, 2016.

/s/ Jonathan W. Fountain
An employee of Lewis Roca Rothgerber Christie LLP